

IN THE UNITED STATES DISTRICT COURT  
FOR THE ~~██████████~~ DISTRICT OF OHIO  
DIVISION

Robert W. Johnson,  
(Enter Above the Name of the Plaintiff in this Action)

Case: 2:22-cv-12093  
Assigned To : Berg, Terrence G.  
Referral Judge: Patti, Anthony P.  
Assign. Date : 9/6/2022  
Description: COMP JOHNSON V.  
CORRECTIONS COMMISSION OF  
NORTHWEST OHIO, ET. AL (KB)

vs.  
Corrections Commission of Northwest Ohio, et al.  
(Enter above the name of the Defendant in this Action)

If there are additional Defendants, please list them:

Dennis Sullivan, Lori Barreras, J. Rita McNeil Danish, William  
Patmon III, Madhu Singh, Charlie Winburn, Angela-Phelps  
White, Inder F. Levesque, Stephanie L. Schoolcraft,  
Fishel, Downey, Albrecht & Riepenhoff LLP & Ohio Civil Rights  
Commission.

COMPLAINT

I. Parties to the action:

Plaintiff: Place your name and address on the lines below. The address you give must be the address where the court may contact you and mail documents to you. A telephone number is required.

Robert W. Johnson  
Name - Full Name Please - PRINT  
112 Court St. : APT. 2  
Street Address  
Watertown, NY 13601  
City, State and Zip Code

Telephone Number

If there are additional Plaintiffs in this suit, a separate piece of paper should be attached immediately behind this page with their full names, addresses and telephone numbers. If there are no other Plaintiffs, continue with this form.

FILED  
SEP 06 2022  
CLERK'S OFFICE  
DETROIT

Defendants:

Dennis Sullivan, Lori Barreras, J. Rita  
McNeil Danish, William Patman III,  
Madhu Singh, Charlie Winburn, Angela  
Phelps-White, Inder F. Levesque,  
Stephanie L. Schoolcraft & Fishel, Downey,  
Albrecht & Riepenhoff LLP and Ohio  
Civil Rights Commission.

## Defendant(s):

Place the name and address of each Defendant you listed in the caption on the first page of this Complaint. This form is invalid unless each Defendant appears with full address for proper service.

1. Corrections Commission of Northwest Ohio  
Name - Full Name Please  
03151 County Road 2425 : Stryker, OH 43557.  
Address: Street, City, State and Zip Code
2. Dennis Sullivan  
03151 County Road 2425 : Stryker, OH 43557.
3. Lori Barreras  
One Government Center : 640 Jackson St. : STE 936 : Toledo, OH 43604
4. J. Rita McNeil Danish  
640 Jackson St. : STE. 936 : Toledo, OH 43604
5. William Patmon III  
640 Jackson St. : STE. 936 : Toledo, OH 43604.
6. Madhu Singh  
640 Jackson St. : STE. 936 : Toledo, OH 43604

If there are additional Defendants, please list their names and addresses on a separate sheet of paper.

## II. Subject Matter Jurisdiction

Check the box or boxes that describes your lawsuit:

- ☐ Title 28 U.S.C. § 1343(3)  
 [A civil rights lawsuit alleging that Defendant(s) acting under color of State law, deprived you of a right secured by federal law or the Constitution.]
- ☐ Title 28 U.S.C. § 1331  
 [A lawsuit "arising under the Constitution, laws, or treaties of the United States."]
- ☐ Title 28 U.S.C. § 1332(a)(1)  
 [A lawsuit between citizens of different states where the matter in controversy exceeds \$75,000.]
- ☒ Title \_\_\_\_\_ United States Code, Section \_\_\_\_\_  
 [Other federal status giving the court subject matter jurisdiction.]

# Defendants:

7. Charlie Winburn

640 Jackson St.: STE. 936: Toledo, OH 43604.

8. Angela Phelps White

640 Jackson St.: STE. 936: Toledo, OH 43604.

9. Inder F. Levesque

640 Jackson St.: STE. 936: Toledo, OH 43604.

10. Stephanie L. Schoolcraft

7775 Walton PKwy.: Suite 200: New Albany,  
OH 43054.

11. Fishel, Downey, Albrecht & Riepenhoff LLP

7775 Walton PKwy.: SUITE 200: New Albany,  
OH 43054.

12. Ohio Civil Rights Commission

640 Jackson St.: STE. 936: Toledo, OH ~~4~~3604

III. Statement of Claim

Please write as briefly as possible the facts of your case. Describe how each Defendant is involved. Include the name of all persons involved, give dates and places.

Number each claim separately. Use as much space as you need. You are not limited to the papers we give you. Attach extra sheets that deal with your statement claim immediately behind this piece of paper.

Robert W. Johnson was discriminated against for Employment by Corrections Commission of Northwest Ohio, Dennis Sullivan, Stephanie L. Schoolcraft and Riepenhoff LLP and denied Due Process For Employee Applicants. Lori Barrera, J. Rita McNeil Danish, William Patman III, Madhu Singh, Charlie Winburn, Angela Phelps-White, Inder F. Levesque & Ohio Civil Rights Commission denied Robert W. Johnson Due Process Rights and merits for Employment Discriminations.



# OHIO CIVIL RIGHTS COMMISSION

Governor Mike DeWine

Commissioners: Lori Barreras, Chair | J. Rita McNeil Danish | William Patmon, III | Madhu Singh | Charlie Winburn  
Executive Director Angela Phelps-White

April 28, 2022

\*\*\*Mailed on April 28, 2022

Robert W. Johnson  
112 Court Street Apt. 2  
Watertown, NY 13601  
[robertojohnsino365@gmail.com](mailto:robertojohnsino365@gmail.com)

Dennis Sullivan, Executive Director  
Corrections Commission of Northwest Ohio  
03151 County Road 2425  
Stryker, OH 43557  
[ccnoregional@gmail.com](mailto:ccnoregional@gmail.com)

## LETTER OF DETERMINATION

Robert W. Johnson v. Corrections Commission of Northwest Ohio  
TOL72(41315)12132021/22A-2022-01134C

### FINDINGS OF FACT:

Charging Party filed a charge of discrimination with the Ohio Civil Rights Commission ("Commission") alleging Respondent engaged in an unlawful discriminatory practice. All jurisdictional requirements for filing a charge have been met.

After receiving the charge, the Commission conducted an investigation into Charging Party's allegation(s) against Respondent. During the investigation, the Commission considered relevant documents and testimony. The information gathered does not support a recommendation that Respondent unlawfully discriminated against Charging Party. Specifically, information shows Charging Party failed to answer specific questions to be considered for the position of Corrections Officer. Further, Charging Party never submitted an application for the vacant Correction Officer position. Respondent deemed another applicant qualified for the position of Corrections Officer.

### DECISION:

The Ohio Civil Rights Commission determines it is **NOT PROBABLE** that Respondent has engaged in an unlawful discriminatory practice in violation of Ohio Revised Code Chapter 4112. Therefore, the Commission hereby orders that this matter be **DISMISSED**.

Please refer to the enclosed **NOTICE OF RIGHT TO SUE** for additional information on Charging Party's suit rights.

### NOTICE OF RIGHT TO REQUEST RECONSIDERATION:

Pursuant to Ohio Administrative Code § 4112-3-04, you have the right to request reconsideration of the Commission's determination. The application must be in writing and state specifically the grounds upon which it is based. You must submit the request for reconsideration, along with all additional evidence or supporting documentation, within **TEN (10) days** of the date of mailing of this notice.

Robert W. Johnson v. Corrections Commission of Northwest Ohio  
TOL72(41315)12132021/22A-2022-01134C  
Page 2

This request must be sent to the Compliance Department, Ohio Civil Rights Commission, 30 East Broad Street, 5<sup>th</sup> Floor, Columbus, Ohio 43215. Any application for reconsideration received after the ten-day period has expired will be deemed untimely.

The Commission's Rules do not permit any employee of the Commission to grant any extension to this ten-day filing period. If you wish to appear before the Commissioners to present oral arguments in support of your request for reconsideration, you must specifically make a request to appear in writing.

**FOR DUAL FILED CHARGES ONLY:**

If your charge was filed with both the Commission and the U. S. Equal Employment Opportunity Commission (EEOC), you have the right to request that the EEOC conduct a review of the Commission finding. The request for such a review must be sent directly to the EEOC State and Local Coordinator at 101 W. Ohio St., Suite 1900, Indianapolis, IN 46204. To secure such a review, you must request it in writing within **FIFTEEN (15) days** of Commission's finding, unless you request a reconsideration by Commission. In that event, our final finding, and the time for you to request review by EEOC, will be determined by Commission's action on your reconsideration request.

**NOTICE OF RIGHT TO PETITION FOR JUDICIAL REVIEW:**

A determination of the Commission that constitutes a Final Order is subject to judicial review, wherein the court reviews the contents of this letter and determines if there are sufficient factual findings supporting why the Commission did not issue a complaint. A petition for judicial review must be filed in the proper common pleas court within **THIRTY (30) days** of the date the Commission mailed this Final Order. The right to obtain judicial review and the mode and procedure thereof is set forth in Ohio Revised Code § 4112.06.

The judicial review process is not a means to reexamine the investigation or further pursue your allegations through the Commission. You may consult with an attorney for information on available options.

A Probable Cause finding is not a Final Order and is not subject to judicial review by a court. All other determinations of the Commission constitute a Final Order and are subject to judicial review by a court.

FOR THE COMMISSION,

***Index F. LeVesque***

Index F. LeVesque  
Toledo Regional Director

cc: **Representative for Charging Party:**  
None on Record

**Representative for Respondent:**  
Stephanie L. Schoolcraft, Partner  
Fishel Downey Albrecht & Riepenhoff LLP  
7775 Walton Parkway, Suite 200  
New Albany, OH 43054  
[sschoolcraft@fisheldowney.com](mailto:sschoolcraft@fisheldowney.com)



## OHIO CIVIL RIGHTS COMMISSION

**Board of Commissioners:**

Lori Barreras – Chair  
William W. Patmon, III  
Madhu Singh  
J. Rita McNeil Danish  
Charlie Winburn



Angela Phelps-White,  
Executive Director

**Charging A. Party,**

**Robert W. Johnson**

**v.**

**Respondent,**

**Corrections Commission of Northwest  
Ohio**

**Charge No. TOL72(41315)12132021  
22A-2022-01134**

### NOTICE OF RIGHT TO SUE

Pursuant to Ohio Revised Code 4112.051, you may file a civil action against the Respondent(s) alleging a violation of Ohio Revised Code 4112. The lawsuit may be filed in any State of Ohio court that has jurisdiction over the matter. Ohio Revised Code 4112.052 and 4112.14 provides that such a civil action must be filed within two years after the date of the alleged discriminatory practice. The time period to file a civil action is tolled during the pendency of the Commission investigation. You are advised to consult with an attorney to determine with accuracy the date by which a civil action must be filed. FOR FEDERAL COURT FILINGS: Notices of Right to Sue under federal law will be issued by the EEOC.

### FOR THE COMMISSION

**Inder F. LeVesque**

Inder F. LeVesque  
Toledo Regional Director  
640 Jackson Street, Suite 936  
Toledo, OH 43604  
419-245-2900

Date mailed: April 28, 2022



V. Relief

In this section please state (write) briefly exactly what you want the court to do for you. Make no legal argument, cite no case or statutes.

\$100,000,000.00 for punitive damages :  
Employment : All other Reliefs  
Just & Proper.

I state under penalty of perjury that the foregoing is true and correct. Executed on

this 30<sup>th</sup> day of April, 2022.

Signature of Plaintiff

Robert W. Johnson

# CERTIFICATE OF SERVICE

I, Robert W. Johnson, served a copy of Civil Cover Sheet, Civil Complaint & IFP Application on ~~04~~ 04/30/2022 upon:

1. Court Clerk: U.S. Courts:  
85 Marconi Blvd. #121: Columbus, OH  
43215.

Robert W. Johnson  
Robert W. Johnson

04/30/2022

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the information provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Robert W. Johnson  
Jefferson

(b) County of Residence of First Listed Plaintiff

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

112 Court St., APT. 2:  
Watertown, NY 13601

**DEFENDANTS**

Corrections Commission  
of Northwest Ohio Williams

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

N/A

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff  
☒ 2 U.S. Government Defendant  
☒ 3 Federal Question (U.S. Government Not a Party)  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- PTF** **DEF**  
☒ 1 Citizen of This State  
☐ 2 Citizen of Another State  
☐ 3 Citizen or Subject of a Foreign Country  
☐ 1 Incorporated or Principal Place of Business In This State  
☐ 2 Incorporated and Principal Place of Business In Another State  
☐ 3 Foreign Nation  
**PTF** **DEF**  
☐ 4  
☒ 5  
☐ 6

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>LABOR</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>INTELLECTUAL PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from Another District (specify)  
☐ 6 Multidistrict Litigation - Transfer  
☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

Federal Question: Due Process Rights.  
Employment Discriminations: Due Process.

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

\$100,000,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND:

☒ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

TO WHOM IT MAY CONCERN,

I AM REQUESTING A  
CHANGE OF VENUE  
DUE TO CONFLICTS OF  
INTERESTS.

~~Robert W. Johnson~~

Robert W. Johnson

08/30/2022

ROBERT W. JOHNSON  
112 COURT ST., APT. 2  
WATERTOWN, NY 13601

COURT CLERK: U.S. COURTS  
231 WEST LAFALETTE BLVD.  
DETROIT, MI 48226

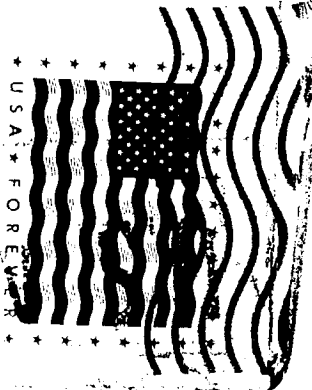


1000

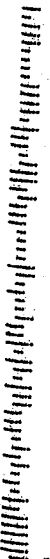


48226

440  
M 6 L



48226-277758



PAID